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REMARKS

**TC 1700**

By this amendment, the claims have been amended to address the Examiner's objection to claims 4-7 and 10-11 as discussed in item 1 on page 2 of the Official Action. Further, said amended claims, are now believed to have rendered moot the rejection of claims 2-4, 6 and 9-11 under 35 U.S.C. §112 (2nd ¶) for the reasons noted by the Examiner in item 3 on pages 2 and 3 of the Official Action. Accordingly, the claims presently pending are claims 2-6, 8-11, 12 and 13-15, Claim 12 being independent and from which all of the remaining claims depend.

On the merits, the Examiner has rejected claims "1-8, 10 and 11" under 35 U.S.C. §102(b) as anticipated by Japanese Patent Document 10-12649. The argument(s) in support of the rejection are set forth in item 5 on pages 3 and 4 of the Official Action. Further, claims 9-11 have been rejected under 35 U.S.C. §103(a) as obvious over the Japanese Patent Document 10-12649. The argument(s) in support of this rejection are discussed in item 7 on pages 4-5 of the Official Action. Finally, claims 1-22 have been rejected under 35 U.S.C. §103(a) as obvious over German Patent Document 43 36572 in view of either Japanese Patent Document 10-12649 or U.S. Patent No. 5,269,998 (Takagi et al). The argument(s) in support of this rejection are set out in item 8 on pages 5-6 of the Official Action.

Applicants respectfully traverse each of the foregoing grounds for rejection, in light of the amended claims presented herein which applicants maintain patentably distinguish the applied prior-art, as well as prior art which Applicants have learned of from prosecution of a corresponding case in Germany. Said new references are the subject of the Supplemental Information Disclosure, filed herewith. In essence, Applicants contend that none of the prior art

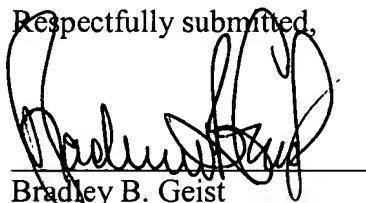
now of record discloses or suggests the novel combination of piezo technology and conventional mechanics. )

Accordingly, Applicants respectfully request favorable reconsideration of the pending claims.

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is captioned "Version with markings to show changes made".



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Version With Markings to Show Changes MadeIn the Claims:

Cancel claims 1 and 7.

Amend the remaining claims as follows:

- - 2 (Twice amended) The apparatus according to claim [1] 12, wherein the piezoelectric actuators are [distributed in a matrix fashion] arbitrarily distributed over the [area] surface between the carrier [clamping platen] plate and closure plate [closing platen].

- - 3 (Twice amended) The apparatus according to claim [1] 12 wherein the piezoelectric actuators are distributed [over the area between clamping platen (AP) and closing platen (SP) in accordance with] according to a desired [force] distribution of force over the surface between the carrier plate and closure plate.

- - 4 (Twice amended) The apparatus according to claim [1] 12, wherein the piezoelectric actuators are [actuated differently over the area between clamping platen and closing platen in accordance with a desired force distribution] differentially triggered according to a desired distribution of force over the surface between carrier plate and closure plate.

- - 5 (Twice amended) The apparatus according to claim [1] 12, wherein the [material subjected to the compressive force has] piezoelectric actuators are triggered dynamically so as to match a dynamic behavior [and the piezoelectric actuators exhibit a matching behavior when triggered] of the material to be pressed and/or the tools to be clamped.

-- 6 (Twice amended) The apparatus according to claim [1] 12, wherein [the] a number of piezoelectric actuators[utilized is] required, said number being derived from a closing force and expansion of the apparatus required for generating a surface pressure [of the platen].

-- 8 (Twice amended) The apparatus according to claim [1] 12, wherein the piezoelectric actuators [have a cube-like] are provided in any desired geometry which can be matched to any machine requirements.

-- 9 (Twice amended) The apparatus according to claim [1] 12, wherein the piezoelectric sensors are provided between [closing platen and clamping platen] closure plate and carrier plate.

-- 10 (Twice amended) The apparatus according to claim [1] 12, wherein during operation, a subset of the piezoelectric actuators [can be] are used as piezoelectric sensors.

-- 11 (Twice amended) The apparatus according to claim [1] 10, wherein [at least one] the piezoelectric actuators [can be used as] that are employed as piezoelectric sensors, are employed only briefly as such sensors.

Please add the following new claims:

-- 12 . A pressure-generating apparatus comprising a stationary support plate, and a carrier plate traveling in relation thereto and capable of being fixed in working position, said carrier plate comprising on its side towards the support plate an electromechanically disengageable closure plate, wherein material to be pressed or tools to be clamped are arranged between the closure plate and the support plate, further wherein a disengaging force is triggered by piezoelectric actuators, and the closure plate is capable of being fixed in at least one

intermediate position which executes a piezo displacement, from which intermediate position the carrier plate can be guided and subsequently fixed with the closure plate being disengaged by an additional piezo displacement.

-- 13. The apparatus according to claim 12 for use in an injection molding machine.

-- 14. The apparatus according to claim 2, wherein the piezoelectric actuators are distributed in a matrix.

-- 15. The apparatus according to claim 8, wherein the piezoelectric actuators are provided in the shape of a rectangle.--